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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,  
Plaintiff,

v.

YOANY VAILLANT,  
a/k/a Yoany Vaillant Fajardo,  
Defendant.

Case No. 2:22-cr-00030-RFB-DJA

**Stipulation to Continue Response and  
Reply Deadlines for Four Weeks for  
Defendant Vaillant's Motion to Sever  
(ECF No. 100) (Second Stipulation to  
Continue)**

Plaintiff United States of America, by and through its counsel, Jason M. Frierson,  
United States Attorney, though Jessica Oliva, Assistant United States Attorney, and  
Kenneth A. Polite, Jr. Assistant Attorney General, through Matthew A. Lamberti, Senior

Counsel; and Defendant Yoany Vaillant, by and through his counsel, Christopher R. Oram, Esq.; hereby stipulate and agree to continue the July 14, 2023 Response and the July 21, 2023 Reply deadlines as to Vaillant's Motion to Sever Defendant (ECF No. 100), to **August 11, 2023 and August 18, 2023, respectively.**

The parties enter this stipulation for the following reasons:

1. On June 16, 2023, Vaillant filed a Motion to Sever Defendant at ECF No. 100.

2. The parties filed a stipulation to extend the Response and Reply deadlines in order to allow for plea negotiations. The Court granted that stipulation and continued those deadlines to July 14 and July 21, 2023, respectively. ECF No. 102.

3. The parties are continuing to engage in plea negotiations and propose postponing the Response and Reply deadlines by an additional four weeks to allow this process to continue. The new Response deadline would be August 11, 2023, and the new Reply deadline would be August 18, 2023. Should the parties be successful, the Motion to Sever Defendant would become moot.

4. At a June 29, 2023 status conference, the Court expressed its intent to continue trial in this case to late February or early March of 2024. Accordingly, the parties' proposed briefing schedule would result in the issue being fully briefed more than 5 months prior to trial.

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5. Accordingly, good cause exists to continue the Response and Reply deadlines by an additional four weeks to permit the parties to engage in plea negotiations, which—if successful—would render the issue moot and thus preserve judicial resources.

Respectfully submitted this 13th day of July, 2023.

CHRISTOPHER R. ORAM, ESQ.

/s/ Christopher R. Oram  
Counsel to Defendant  
Yoany VAILLANT

JASON M. FRIERSON  
United States Attorney

/s/ Jessica Oliva  
RICHARD ANTHONY LOPEZ  
JESSICA OLIVA  
Assistant United States Attorneys

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Assistant Attorney General

/s/ Matthew A. Lamberti  
MATTHEW A. LAMBERTI  
Senior Counsel  
MICHAEL CHRISTIN  
Trial Attorney  
United States Department of Justice

**IT IS SO ORDERED** this the 14th day of July, 2023

  
HONORABLE RICHARD F. BOULWARE  
DISTRICT COURT JUDGE